

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

AT&T MOBILITY LLC,  
SPRINT/UNITED MANAGEMENT  
COMPANY, T-MOBILE USA, INC.,  
AND CELLCO PARTNERSHIP D/B/A  
VERIZON WIRELESS,

Defendants

and

HTC CORP., and HTC AMERICA, INC.,

Intervenors.

Civil Action No. 2:20-cv-4

**DEMAND FOR JURY TRIAL**

**UNOPPOSED MOTION FOR LEAVE TO SUPPLEMENT THE CLAIM  
CONSTRUCTION RECORD**

Plaintiff seeks leave to supplement the claim construction record with regard to *Convolve v. Compaq Computer Corp.*, 812 F.3d 1313 (Fed. Cir. 2016), which Defendants and Intervenors raised for the first time during the Court's July 24, 2020 *Markman* hearing.

Defendants and Intervenors are not opposed to this relief so long as they have the opportunity to file a responsive brief of equivalent length within 5 days. In that event, Plaintiff would also request leave to file a short reply within 3 days.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with the Federal Rules of Civil Procedure. All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. Mail, CMRRR on this 30th day of July, 2020.

*/s/Geoff Culbertson*  
Geoffrey Culbertson